

## Michael J. Willemin

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## **VIA ECF**

The Honorable Ronnie Abrams United States District Judge Southern District of New York Thurgood Marshall Courthouse 40 Foley Square, Room 1506 New York, NY 10007

Re: Eckhart v. Henry; Case No. 20-cv-5593 (RA) (GWG)

Dear Judge Abrams,

We represent Plaintiff in the above-referenced action and write on behalf of both parties in connection with Your Honor's Order regarding expert discovery, Dkt. No. 483. We apologize for any confusion. The reason that we did not raise any disputes with the Court or Judge Gorenstein is because there ultimately were no disputes. The parties agreed that expert discovery had not closed pursuant to Judge Gorenstein's prior Orders, and agreed upon a schedule for the disclosure of expert reports in advance of trial. The parties agreed that Plaintiff's expert report would be served on May 9, 2025, and that Defendant's rebuttal report would be served on Plaintiff on June 9, 2025. Accordingly, we respectfully request that expert discovery remain open through June 9, 2025, solely for the purpose of each party making the aforementioned expert disclosures.

We thank Your Honor for the Court's time and consideration of this matter.

Respectfully submitted,

Michael J. Willemin

Application granted. The parties are reminded, however, that the deadline for all pretrial submissions is May 12, 2025, and that no pretrial motions, including but not limited to motions in limine, will be accepted after that date. *See* Individual Rule 6(B)(i).

SO ORDERED.

Hon. Ronnie Abrams

May 1, 2025